

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In Re:

G.M. CROCETTI, INC.,

Debtor.

Bankruptcy Case No. 07-10319 (BRL)

G.M. CROCETTI, INC.,

Plaintiff,

v.

TRATAROS CONSTRUCTION, INC. and
TRAVELERS CASUALTY AND SURETY
COMPANY,

Defendants.

Adversary No. 08-01234 (BRL)

Civil Action No. 08-CV- _____

**NOTICE OF MOTION
FOR ORDER WITHDRAWING THE
REFERENCE FOR ADVERSARY
PROCEEDING NO. 08-01234**

PLEASE TAKE NOTICE that, upon the accompanying declaration of Eli J. Rogers, dated July 3, 2008, the exhibits attached thereto, and the supporting memorandum of law, together with all reply papers, if any, and all other pleadings and proceedings had in this action, Defendants, Trataros Construction, Inc. and Travelers Casualty and Surety Company, shall move this Court before the Hon. _____, U.S.D.J. presiding, at the United States Courthouse, Southern District of New York, 500 Pearl Street, New York, New York, on July 31, 2008, 10:00 A.M., or as soon thereafter as counsel may be heard, for an Order pursuant to 28 U.S.C.A. § 157(d) withdrawing this Court's reference to the United States Bankruptcy Court for the Southern District of New York for the adversary proceeding bearing Adversary No. 08-01234, and entitled G.M. Crocetti v. Trataros Construction, Inc., et al., and joining the said adversary proceeding to the civil action pending before the Honorable Denise L. Cote, U.S.D.J.

entitled Travelers Casualty and Surety Company as Administrator for Reliance Insurance Company v. Dormitory Authority – State of New York, et al., Case No. 07-CV-6915, pursuant to Fed R. Civ. P. 19(a)(2).

PLEASE TAKE FURTHER NOTICE that answering papers, if any, to this motion shall be served by hand or electronic case filing upon the Defendants' attorneys, Dreifuss Bonacci & Parker, LLP, 26 Columbia Turnpike, North Entrance, Florham Park, New Jersey 07932, on or before July 18, 2008.

Dated: Florham Park, New Jersey
July 3, 2008

DREIFUSS BONACCI & PARKER, LLP

By: /s/
Eli J. Rogers (ER-6564)
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-and-
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*Attorneys for Trataros Construction, Inc. and
Travelers Casualty and Surety Company*

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